

U.S. Department of Justice

United States Attorney Eastern District of New York

CMP/AMC F. #2011R01474 271 Cadman Plaza East

Brooklyn, New York 11201

October 24, 2011

VIA ECF

Howard R. Leader, Esq. 381 Park Ave. South, Suite 701 Wenger & Arlia, Esgs. LLP New York, NY 10016

Bruce Wenger, Esq. 20 Vesey St., Suite 210 New York, NY 10007

Robert Anthony Evans, Jr., Esq. Gerald J. Di Chiara 274 W. 145th St., Suite 300 New York, NY 10039

3 Park Ave., 15th Floor New York, NY 10016

Michael Schneider, Esq. Federal Defenders of New York, 16 Court St., 3rd Fl. Brooklyn, NY 11241

Michael P. Beys, Esq. Jason H. Berland, Esq. Beys, Stein & Mobargha LLP 405 Lexington Ave., 7th Floor New York, NY 10174

Maurice H. Sercarz Sercarz & Riopelle 152 W. 57th St., 24th Fl. New York, NY 10019

> Re: United States v. Walters, et al. Criminal Docket No. 11-683 (NG)

Dear Counsel:

By this letter, the government discloses discovery pursuant to Rule 16 of the Federal Rules of Criminal Procedure. Please also consider this letter to be the government's request for reciprocal discovery.

The following discovery exhibits are available at First Choice Copy, (718) 381-1480. You may order copies of these discovery exhibits by calling First Choice Copy and referencing print order number 60081.

Discovery Exhibit Number	Description
28	CD containing surveillance photos of Morales and/or Villalona taken on Feb. 16, 18 and August 3, 2011
29	CD containing surveillance photos of Walters taken on May 26, 2011
30	CD containing surveillance photos of Walters and/or Dunn taken on June 17, 2011
31	CD containing various documents associated with the Cooper Decatur Cluster HPD project, including buy-sell agreement, mortgage documents and construction contract with MCR Restoration Corp.

The government will continue to provide any additional documents, objects and other discovery within the scope of Fed. R. Crim. P. 16 as they become available.

If you have any questions, please contact the undersigned.

Sincerely,

LORETTA E. LYNCH UNITED STATES ATTORNEY

_/s/ Cristina M. Posa
By: Cristina M. Posa
Anthony M. Capozzolo
Assistant United States Attorneys
(718) 254-6668/6454

cc: Clerk of the Court (NG) via ECF